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15 *NETFLIX, INC.*

16 **UNITED STATES DISTRICT COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**
18 **OAKLAND DIVISION**

19
20 LAURI VALJAKKA,
21 Plaintiff,
22 v.
23 NETFLIX, INC.,
24 Defendant.

Case No. 4:22-cv-01490-JST

**DEFENDANT NETFLIX, INC.'S NOTICE
OF DISPUTE REGARDING THE
FORMAT, SCOPE, OR CONTENT OF
THE DECEMBER 12, 2022 CLAIM
CONSTRUCTION HEARING**

Judge: Honorable Jon S. Tigar

NOTICE OF DISPUTE

Defendant Netflix, Inc. (“Netflix”) submits this Notice of Dispute pursuant to the Court’s May 5, 2022, Scheduling Order. *See* Dkt. 38 at 2:5–7. The court requires the parties to exchange materials and “bring any disputes regarding the format, scope, or content of any tutorial or hearing to the Court’s attention at least five court days before the tutorial or hearing.” *Id.* On November 21, 2022, the parties agreed to exchange audio-visual materials by no later than December 2, 2022, so that each party may have time to object to materials by December 5, 2022 (five-days before the Claim Construction Hearing scheduled for December 12, 2022 (“the Hearing”)). Despite the Court’s order and the parties’ agreement, Valjakka did not submit any audio-visual materials to Netflix by the agreed-upon date. Prior to filing this notice, Netflix requested to meet and confer with Valjakka, but did not receive a response to its request. Valjakka’s continued delay in serving these materials prejudices Netflix’s ability to adequately prepare for the Hearing.

Because these materials have not been timely provided to Netflix, Netflix objects to any use of Valjakka’s audio-visual materials at the Hearing.

1 Dated: December 5, 2022

PERKINS COIE LLP

3 By: /s/ *Elise S. Edlin*

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